

P.O. Box 744
Jefferson, NC 28640

September 26, 2008

Thomasenia Duncan, Esquire
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2008 OCT - 8 A 9 38

Re: Complaint Against Roy Carter for Congress Committee

MUR # 6091

Dear Ms. Duncan:

Pursuant to 2 USC § 437g(a)(1) and 11 CFR § 111.4, please accept this letter as a Complaint against Roy Carter for Congress Committee ("Carter Campaign"). Roy Carter is a candidate for Congress in the 5th District of North Carolina.

The facts in this matter indicate that the Carter Campaign accepted a contribution from Bully Documentary Company in violation of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission ("FEC" or "Commission").

The Carter Campaign ran a television advertisement from May 3-5, 2008. *See Exhibit A.* This advertisement and three others were produced for the Carter Campaign by Frank Eaton with Bully Documentary Incorporated. According to Bully Documentary's YouTube page at www.youtube.com/user/mojolingo, Bully Documentary is responsible for all four of these videos, and Frank Eaton is listed as the owner of the page. *See Exhibit B.* Frank Eaton is also an employee of Bully Documentary Inc.¹ However, the Carter Campaign does not list a single disbursement in conjunction with the production of the advertisements in its July Quarterly Report filed with the FEC. *See Exhibit C.* As a matter of fact, the Carter Campaign does not list any transaction with regard to the production of the advertisement.

It would appear that the Carter Campaign has accepted an illegal contribution from Bully Documentary Inc. and blatantly disregarded the law with regard to contributions and reporting requirements of the FEC. Corporations and labor organizations are prohibited from making contributions to political committees. 2 USC § 441b(a).

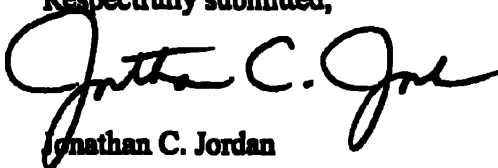
¹ See attached FEC Report for John Edwards for 2007 and Business Corporation Information from the North Carolina Department of the Secretary of State.

10044260317

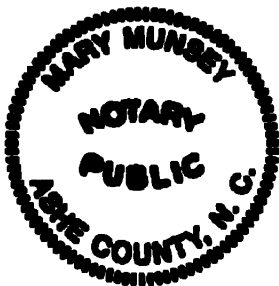
Accordingly, I respectfully request that the Commission conduct an immediate investigation into the violations outlined above and impose the maximum penalty under law.


The foregoing is correct and accurate to the best of my knowledge, information and belief.

Respectfully submitted,


Jonathan C. Jordan

Sworn to and subscribed before me this 26th day of September, 2008.





Notary Public

My Commission Expires: 6-22-2013

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10044260319

Exhibit B



Internet Explorer

Address bar

https://www.youtube.com/user/mojolingo

Search bar


Search

Navigation bar

Home | Account | Queue | Help | Sign Out

YouTube logo


Video Channels Community Upload



mojolingo
Joined August 4, 2006
Last log in 2 days ago
Videos: 37
Subscribers: 3

The Bully Documentary Co.


Subscribe



6:00 / 6:45 44

Subscribe to mojolingo's videos


Search




ROY CARVER

Subscriptions (3)

Videos (37)




Connect with mojolingo



ROY CARVER

Subscriptions (3)

Videos (37)



ROY CARVER

Subscriptions (3)

Videos (37)

Taskbar

Start | Internet Explorer | 2 Internet Explorer | 1 | 1:25 PM

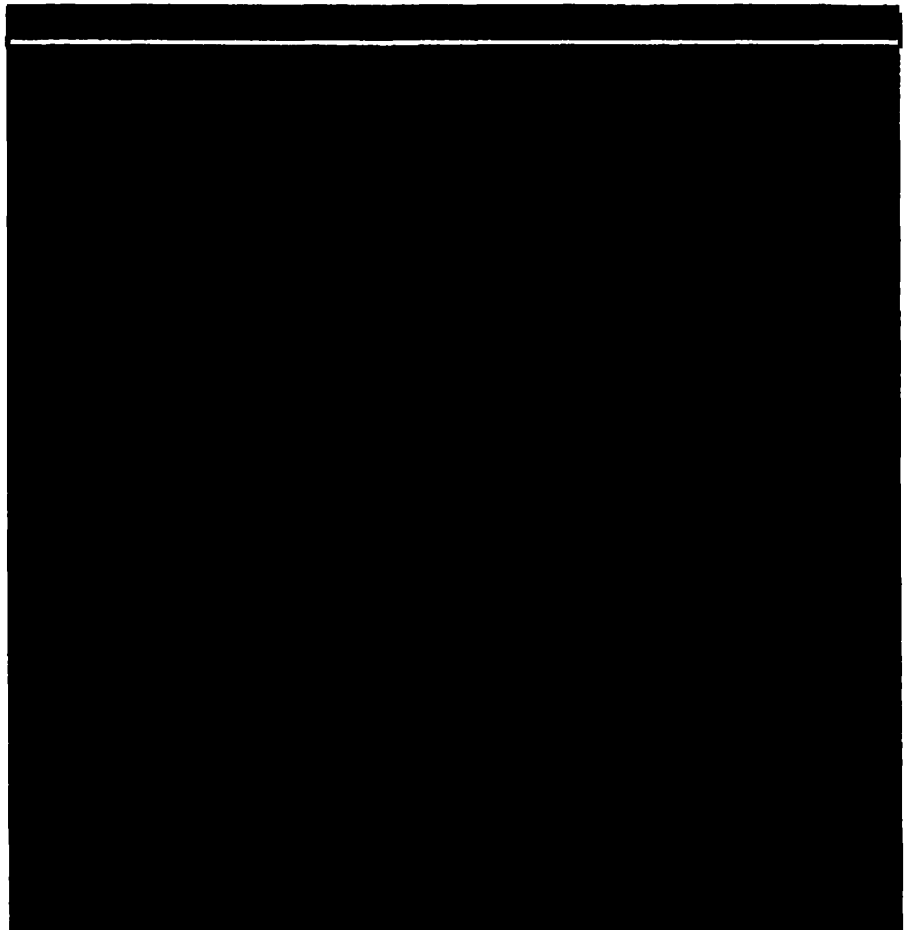
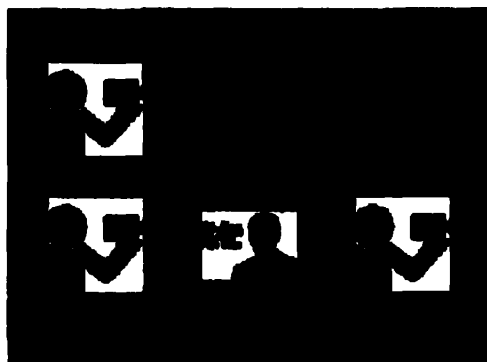
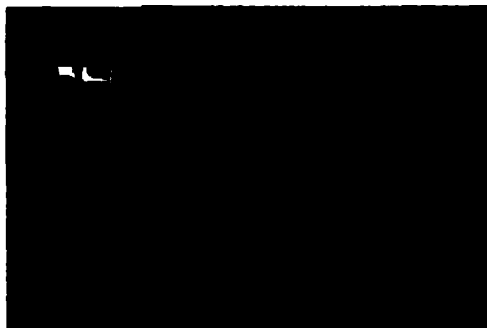
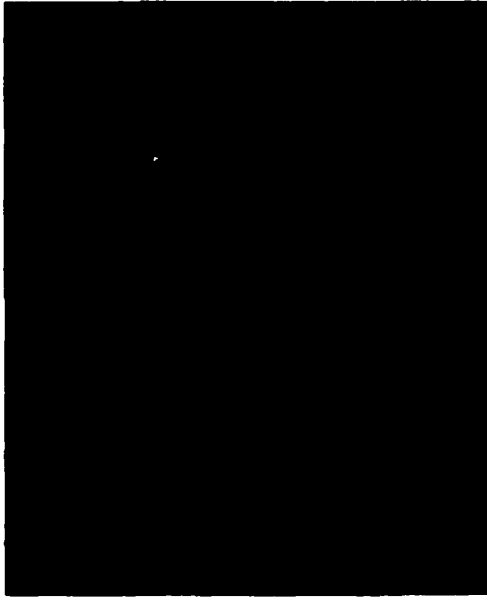
English

toddpoole1

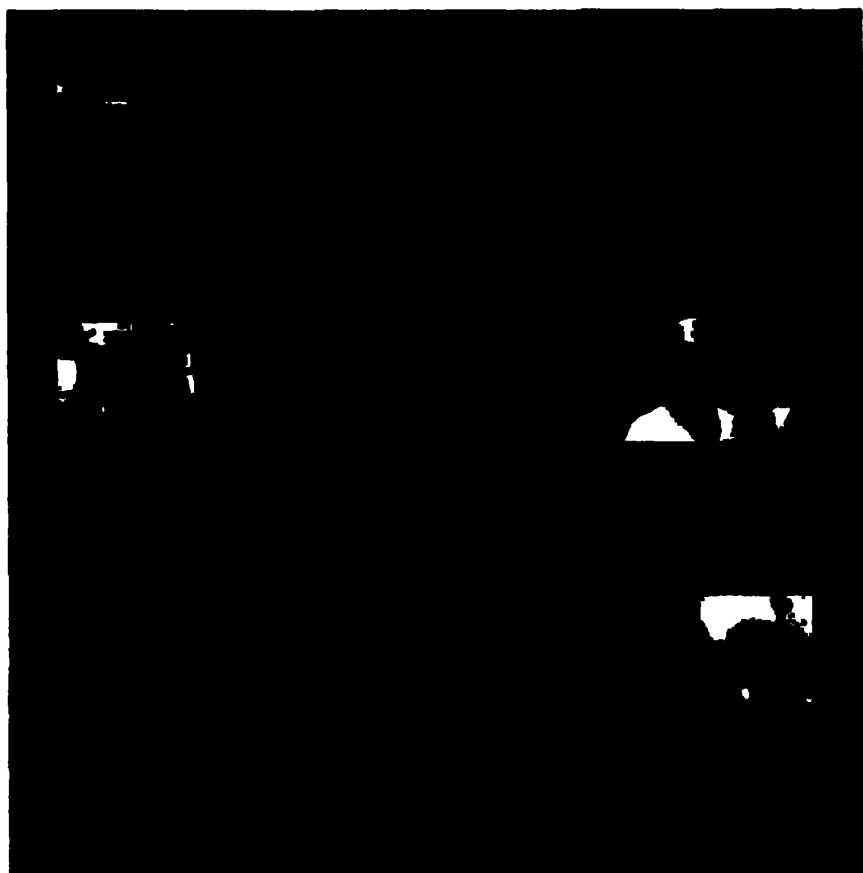
(0) Account ▾ QuickList Help Sign Out

Videos | Channels | Community | Upload

Videos | Favorites | Playlists | Groups | Friends | Subscribers | Subscriptions



10044260321



10044260322

English

toddpoole1

(0) Account ▾ Outbid List Help Sign Out

Videos Channels Community Upload

Channel | Videos | Favorites | Playlists | Groups | Friends | Subscribers | Subscriptions



10044260323

Worldwide English

toddpole1

(0) Account v QuickList (0) Help Sign Out

Home

Videos

Channels

Community

Videos

Search

advanced

Upload

Roy Carter for Congress



0:14 / 0:36 44:00

Rate:

6 ratings

Views: 836

Share

Favorite

Playlists

Flag

Send Video

MySpace

Facebook

more share options

Commentary

Statistics & Data

Video Responses: 0

Text Comments: 5

Video Responses (0)

Post a Video Response

Text Comments (5)

Post a Text Comment

Show: [Average (-5 or better)] Help

shoobydewow (4 months ago)

Reply | Spam +1

Coach Carter will fight for us all in Washington

123Pariel (4 months ago)

Reply | Spam 0

You da man coach! Keep it up!

medamebovery66 (4 months ago)

Reply | Spam +1

A Genuine human being running for office for a change!!!

wadeater100 (4 months ago)

Reply | Spam 0

We love you Coach Carter!

amyrebecca75 (4 months ago)

Reply | Spam +1

Awesome. Go Roy, Go!

View all 5 comments

Comment on this video

Post a Video Response



User: mojolingq

Subscribe

Joined: May 01, 2009

(more info)

Roy Carter is running for Congress from North Carol...

URL <http://www.youtube.com/watch?v=ccu3pjS14gU>Embed `<object width="425" height="344"><param name="movie" value="http://www.youtube.com/watch?v=ccu3pjS14gU"></object>`

More From: mojolingq

Related Videos



Roy Carter on UNC-TV
08:23 From: RoyCarter08
Views: 317



Roy Carter at Blogger Bash
02:08 From: thesouthernham
Views: 148



Roy Carter Victory Speech
06:39 From: RoyCarter08
Views: 184



Diane Hamby at the Fifth District
Meeting
03:08 From: dianehambyforcongres
Views: 88



Coach Roy Carter for Congress
00:31 From: mojolingq

Promoted Videos



Concrete
Jungle
Coast
00:33
QD1ENT



German
Supercar
Gumpert...
04:48
StreetfireN...



SoCo Music
Night 01:
P...
03:48
MyDamnChannel



LONDON
FASHION
WEEK + PPQ
04:22
NylonMagazi...

Exhibit C

SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 67/68

☒ 17 ☐ 18 ☐ 19a ☐ 19b
20a 20b 20c 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in full)

ROY CARTER FOR CONGRESS COMMITTEE

Full Name (Last, First, Middle Initial)

Walter Warner Cable Media

Mailing Address 316 East Morehead St
Suite 200

City Charlotte State NC Zip Code 28202

Purpose of Disbursement
Multiple 30 Second TV commercial

Candidate Name
ROY CARTER FOR CONGRESS COMMITTEE

Office Sought: ☒ House ☐ Senate ☐ President
Disbursement For: 2008
☒ Primary ☐ General
Other (specify) ☐

State: NC District: 05

Transaction ID: SB17.8727
Date of Disbursement

06 / 07 / 2008

Amount of Each Disbursement This Period

1600.00

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.63

004
Category/
Type

Full Name (Last, First, Middle Initial)

Ms Mary F. Timmerman

Mailing Address PO Box 6435

City Winston-Salem State NC Zip Code 27113

Purpose of Disbursement
Rent HQ

Candidate Name
ROY CARTER FOR CONGRESS COMMITTEE

Office Sought: ☒ House ☐ Senate ☐ President
Disbursement For: 2008
☐ Primary ☒ General
Other (specify) ☐

State: NC District: 05

Transaction ID: SB17.8571
Date of Disbursement

08 / 08 / 2008

Amount of Each Disbursement This Period

506.71

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.63

001
Category/
Type

Full Name (Last, First, Middle Initial)

USPS

Mailing Address Harris Mail Blvd

City Winston-Salem State NC Zip Code 27104

Purpose of Disbursement
Post Card Stamps

Candidate Name
ROY CARTER FOR CONGRESS COMMITTEE

Office Sought: ☒ House ☐ Senate ☐ President
Disbursement For: 2008
☐ Primary ☒ General
Other (specify) ☐

State: NC District: 05

Transaction ID: SB17.8608
Date of Disbursement

08 / 30 / 2008

Amount of Each Disbursement This Period

27.00

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 400.63

003
Category/
Type

SUBTOTAL of Disbursements This Page (optional) >

2133.71

TOTAL This Period (last page this line number only) >

PR00000

FEC Schedule B (Form 3) (required 12/2007)

10044260325

See Footnote 1

**SCHEDULE A
ITEMIZED RECEIPTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER: PAGE 1558/1521
(check only one)

<input type="checkbox"/> 16	<input type="checkbox"/> 17a	<input type="checkbox"/> 17b	<input type="checkbox"/> 17c	<input type="checkbox"/> 17d	<input type="checkbox"/> 18
<input type="checkbox"/> 19a	<input type="checkbox"/> 19b	<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input type="checkbox"/> 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

~~South Wayne County Republican Committee~~

A. May Edward Full Name (Last, First, Middle Initial) Mailing Address 8788 County Road D City State Zip Code South Wayne WI 53867 FEC ID number of contributing federal political committee.		Date of Receipt M / D / Y 08 / 12 / 2007 Amount of Cash Receipt This Period 100.00
Name of Employer Not employed Receipt For: 2008 X Primary General Other (specify) <input type="checkbox"/>		Occupation Retired Election Cycle-to-Date <input checked="" type="checkbox"/> 628.00 Transaction ID: 180888
B. May Edward Full Name (Last, First, Middle Initial) Mailing Address 8788 County Road D City State Zip Code South Wayne WI 53867 FEC ID number of contributing federal political committee.		Date of Receipt M / D / Y 08 / 18 / 2007 Amount of Cash Receipt This Period 100.00
Name of Employer Not employed Receipt For: 2008 X Primary General Other (specify) <input type="checkbox"/>		Occupation Retired Election Cycle-to-Date <input checked="" type="checkbox"/> 628.00 Transaction ID: 181360
South Wayne County Republican Committee Full Name (Last, First, Middle Initial) Mailing Address 211 E 3rd St City State Zip Code Winston Salem NC 27101-4158 FEC ID number of contributing federal political committee.		Date of Receipt M / D / Y 08 / 27 / 2007 Amount of Cash Receipt This Period 1000.00
Name of Employer South Wayne County Republican Committee Receipt For: 2008 X Primary General Other (specify) <input type="checkbox"/>		Occupation State Representative Election Cycle-to-Date <input checked="" type="checkbox"/> 1000.00 Transaction ID: 220305
SUBTOTAL of Receipts This Page (optional) -----		1200.00
TOTAL This Period (last page this line number only) -----		
FEC Schedule A (Revised 1/2007)		

See Footnote 1

State of North Carolina
Department of the Secretary of State

ARTICLES OF INCORPORATION

SOSID: 830404
Date Filed: 6/9/2006 2:16:00 PM
Elaine F. Marshall
North Carolina Secretary of State
C200615700597

Pursuant to §55-2-02 of the General Statutes of North Carolina, the undersigned does hereby submit these Articles of Incorporation for the purpose of forming a business corporation.

1. The name of the corporation is: Bully Documentary Inc.

2. The number of shares the corporation is authorized to issue is: 10,000

3. These shares shall be: (check either a or b)

a. ☒ all of one class, designated as common stock; or

b. ☐ divided into classes or series within a class as provided in the attached schedule, with the information required by N.C.G.S. Section 55-6-01.

4. The street address and county of the initial registered office of the corporation is:

Number and Street 936 W 4th Street, Suite 102

City Winston-Salem State NC Zip Code 27101 County Forsyth

5. The mailing address, *if different from the street address*, of the initial registered office is:

Number and Street _____

City _____ State _____ Zip Code _____ County _____

6. The name of the initial registered agent is: Larry E. O'Dell

7. Principal office information: (must select either a or b.)

a. ☐ The corporation has a principal office.

The street address and county of the principal office of the corporation is:

Number and Street _____

City _____ State _____ Zip Code _____ County _____

The mailing address, *if different from the street address*, of the principal office of the corporation is:

Number and Street _____

City _____ State _____ Zip Code _____ County _____

b. ☒ The corporation does not have a principal office.

See Footnote 1

8. Any other provisions, which the corporation elects to include, are attached.

9. The name and address of each incorporator is as follows:

Frank Eaton, Incorporator

211 East Third Street

Winston-Salem, NC 27101

10. These articles will be effective upon filing, unless a date and/or time is specified:

June 1, 2006

This the 19th day of May 2006


Signature

Frank Eaton, President INCORPORATOR
Type or Print Name and Title

NOTES:

CORPORATIONS DIVISION
(Revised January, 2002)

P. O. BOX 29622

RALEIGH, NC 27626-0622
(Form B-01)

10044260328

CD-479 (4/07)

8-21-07

Business Corporation North Carolina Annual ReportThis report may be filed online at the Secretary of State website: www.sos.nc.gov

SOSID: 0850404

Date Filed: 5/5/2008 11:01:00 AM

Elaine F. Marshall

North Carolina Secretary of State

2008 150 00022

Name of Business Corporation: **BULLY DOCUMENTARY INC**Fiscal Year Ending: **12 31 07**

Month / Day / Year

State of Incorporation: **NC**Secretary of State ID Number: **0850404**☒ I hereby certify that the information requested below (required by NCGS 55-16-22) has not changed since the most recently filed annual report and is therefore complete.

Nature of Business:

Registered Agent:

Registered Office Mailing Address:

County:

City:

State:

Zip Code:

Registered Office Street Address:

County:

City:

State:

Zip Code:

Signature of New Registered Agent:

(Signature constitutes consent to the appointment)

Principal Office Telephone Number:

Principal Office Mailing Address:

City:

State:

Zip Code:

Principal Office Street Address:

City:

State:

Zip Code:

Name, Title, and Business Address of Principal Officers:

Name:	Title:		
Address:			
City:	State:	Zip:	

Name:	Title:		
Address:			
City:	State:	Zip:	

Name:	Title:		
Address:			
City:	State:	Zip:	

Certification of Annual Report (Must be completed by all Business Corporations).



Signature (Form must be signed by an officer of corporation)

Frank Nottingham Earn

Type as Print Name

3-17-2008

President

Title

10044260329

See Footnote 1

CD-479 (48)

Business Corporation North Carolina Annual

10-18-08

This report may be filed online at the Secretary of State website: www.sos.nc.gov

SOBID: 0850404
Date Filed: 5/6/2008 2:46:00 PM
Elaine F. Marshall
North Carolina Secretary of State
2007 099 02205

Name of Business Corporation: **ELIMINE DOCUMENTARY, INC.**

Fiscal Year Ending: **12 31 06**

Month / Day / Year

State of Incorporation: **NC**

Secretary of State ID Number: **0850404**

☐ I hereby certify that the information requested below (required by NCSS 55-18-22) has not changed since the most recently filed annual report and is therefore complete.

Nature of Business: **Media company**

Registered Agent: **LARRY E ODELL CPA**

Registered Office Mailing Address:

936 W 4TH STREET STE 102

County:

City: **WINSTON SALEM**

State: **NC**

Zip Code: **27101**

Registered Office Street Address:

936 W 4TH STREET STE 102

County:

City: **WINSTON SALEM**

State: **NC**

Zip Code: **27101**

Signature of New Registered Agent:

(Signature constitutes consent to the appointment)

Principal Office Telephone Number:

3366243717

Principal Office Mailing Address:

211 EAST THIRD STREET

City: **WINSTON SALEM**

State: **NC**

Zip Code: **27101**

Principal Office Street Address:

211 EAST THIRD STREET

City: **WINSTON SALEM**

State: **NC**

Zip Code: **27101**

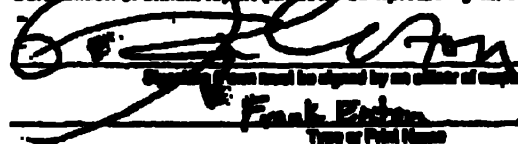
Name, Title, and Business Address of Principal Officers:

Name:	FRANK W EATON	Title:	PRESIDENT
Address:	211 EAST THIRD STREET		
City:	WINSTON SALEM	State:	NC
		Zip:	27101

Name:		Title:	
Address:			
City:		State:	
		Zip:	

Name:		Title:	
Address:			
City:		State:	
		Zip:	

Certification of annual report (Must be completed by all Business Corporations).



Type or Print Name

4/14/08

Title